UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TIMOTHY TAYLOR,)
Plaintiff,	<i>)</i>)
v.)
DISCOVERY, INC. and) STIPULATION OF VOLUNTARY
THE EXPLORERS CLUB,) DISMISSAL PURSUANT TO) F.R.C.P. 41(a)(1)(A)(ii)
Defendants,) 1.K.C.1.41(a)(1)(A)(II)
and) Civil Action No. 1:21-cv-03046-JSR
THE EXPLORERS CLUB,) CIVII ACUOII NO. 1.21-CV-03040-JSK
Third-Party Plaintiff,))
v.)
SYLVIA EARLE and THE SYLVIA EARLE))
ALLIANCE d/b/a MISSION BLUE,)
Third-Party Defendants.)
	_)

STIPULATION OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii) WITH PREJUDICE

IT IS HEREBY STIPULATED AND AGREED by and between the parties and their respective counsels that pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), and subject to a confidential settlement agreement, the above-captioned action is voluntarily dismissed with prejudice against the defendants and third-party defendants. The Court shall retain jurisdiction to enforce the terms of the settlement agreement.

Each party to bear its own costs and attorneys' fees.

Date: September 1, 2021

Respectfully submitted,

Barclay Damon LLP

By:

Michael A. Oropallo Lauren J. Wachtler 1270 6th Avenue Suite 501 New York, New York 10020 Telephone: (315) 425-2831 Facsimile: (315) 703-7367

Facsimile: (315) 703-7367 moropallo@barclaydamon.com

Attorneys for Plaintiff Timothy Taylor

Thompson Coburn LLP

By: This ham

Michael L. Nepple – pro hac vice mnepple@thompsoncoburn.com
Thompson Coburn LLP
One US Bank Plaza
St. Louis, Missouri 63101-1611
(314) 552-6000

Attorney for Defendant and Third-Party Plaintiff The Explorers Club

Davis Wright Tremaine LLP

Bv:

Jeremy A. Chase

Davis Wright Tremaine LLP

1251 Avenue of the Americas, 21st Floor

New York, New York 10020

jeremychase@dwt.com

(212) 489-8230

Attorney for Defendant Discovery, Inc.